

EXHIBIT B

Small Claims PetitionNO. 215100020040

Christopher Eustice § In the Justice Court of Harris County, Texas
 _____ § Precinct 5 Place 1
 Plaintiff(s) §
 vs. §
Citibank, N.A. §
 _____ §
 Defendant(s) §

Plaintiff: Christopher Eustice

Describe the legal nature of the plaintiff (e.g., individual, sole proprietorship, partnership, corporation)

IndividualDefendant: Citibank, N.A.Address: 388 Greenwich StreetCity: New York State: NY Zip: 10013 Date of Birth (if applicable): _____

Describe the legal nature of the defendant (e.g., individual, sole proprietorship, partnership, corporation)

Corporation*Defendant may be served by serving Mike Corbat, CEO of Citibank N.A.

(state the name of the defendant if defendant is an individual, or state the name and title of the person who is authorized to receive service of process for the defendant if defendant is a partnership, limited partnership, corporation, or limited liability company), who may be served at

388 Greenwich Street New York NY 10013

(state the address for service of process).

The defendant's usual place of business or residence, or other place where defendant can probably be found is _____

212 W 18th St New York, NY 10011**Cause of Action**

(State the cause of action in plain and concise language, sufficient to give fair notice of the claim and to provide enough information to enable the defendant to prepare a defense. You may include information showing venue is proper in the Justice of the Peace Precinct in which you are filing. If you are seeking personal property, you must describe the property and state the value of the property.)

Defendant unlawfully and fraudulently closed the Plaintiff's bank account near the end of September 2020 in order to avoid paying a \$1500.00

bank account signup bonus. Plaintiff met all funding requirements prior to account closure, and the funds were in place on the account for over 60 days as required. He maintained the balance until Citibank unlawfully closed his account. Citibank refused to pay the \$1500 over a nonmaterial breach of their contract that had nothing to do with the Plaintiff or with account funding requirements.

BREACH OF CONTRACT, FCBA VIOLATIONS, AND ELECTRONIC FUNDS TRANSFER ACT ("EFTA") VIOLATIONS FOR MISHANDLED DEBIT CARD DISPUTES, UNLAWFUL CLOSURE OF PLAINTIFF'S BANK ACCOUNTS IN VIOLATION OF

Relief Requested (Describe the relief you are requesting, itemizing the amount of damages you are seeking.)\$19,568.00 in total monetary damagesTHE EQUAL CREDIT OPPORTUNITY ACT
("ECOA") 15 U.S.C. §1691 et seq.

Respectfully submitted,

Chris Eustice
Signature of Plaintiff or Plaintiff's Attorney of RecordPrinted Name: Christopher D Eustice

State Bar No. _____

Address: 655 West Forest Dr. Houston TX 77079Telephone: 832-259-1634

Fax Number: _____

E-Mail Address: chris.eustice@sbcglobal.net☒ Plaintiff consents to the e-mail service of the answer and any other motions or pleadings to this e-mail address.

Case Number: 215100020040

Christopher Eustice
Plaintiff
vs.
Citibank, N.A.
Defendant

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§
§
§
§

In the Justice Court
Harris County, Texas
Precinct 5, Place 1
6000 Chimney Rock Road
Suite 102
Houston, TX 77081
713-274-8700
www.jp.hctx.net

Citation (Small Claims Case)

THE STATE OF TEXAS
COUNTY OF HARRIS

TO: ANY SHERIFF, CONSTABLE, PROCESS SERVER CERTIFIED UNDER ORDER OF THE SUPREME COURT, OTHER PERSON AUTHORIZED BY COURT ORDER, OR CLERK:

Deliver this citation, together with a copy of the petition, to:

Citibank, N.A. By Serving
Mike Corbat, CEO of Citibank, N.A.
388 Greenwich Street
New York NY 10013

ALTERNATIVE SERVICE ADDRESS
212 W 18th St
New York, NY 10011

TO THE DEFENDANT:

You have been sued. You are commanded to appear by filing a written answer to the petition filed by Plaintiff with the Clerk of the Court on or before the end of the 14th day after the date of service of this citation. If you fail to file an answer as required, a judgment by default may be rendered for the relief demanded in the petition.

Date Petition Filed: 01/15/2021

Nature of demand made by Plaintiff(s): money owed in the amount of \$19,568.00. A copy of the petition is attached.

Notice

You have been sued. You may employ an attorney to help you in defending against this lawsuit. But you are not required to employ an attorney. You or your attorney must file an answer with the court. Your answer is due by the end of the 14th day after the day you were served with these papers. If the 14th day is a Saturday, Sunday, or legal holiday, your answer is due by the end of the first day following the 14th day that is not a Saturday, Sunday, or legal holiday. Do not ignore these papers. If you do not file an answer by the due date, a default judgment may be taken against you. For further information, consult the Texas Rules of Civil Procedure, Part V, Rules of Practice in Justice Courts. A copy of the Rules is available at <http://www.jp.hctx.net/> or at the Justice Court.

Date: 4/6/2021



/s/ Mariela Perez
Clerk of the Court
Harris County Justice Court
Precinct 5, Place 1

Address of Plaintiff

655 West Forest Dr
Houston TX 77079

Address of Plaintiff's Attorney

Plaintiff Christopher Eustice

VS

Defendant Citibank, N.A.

CERTIFICATE OF SERVICE

CASE # 215100020040I HEREBY CERTIFY THAT ON THIS 6th DAY OF April, 2021

I HAVE DELIVERED A TRUE AND CORRECT COPY OF

(document/filing) Small Claim CitationBY: (means of delivery) Certified Mail

TO THE FOLLOWING:

Citibank N.A. by serving
Mike Corbat, CEO of Citibank N.A.
NAME388 Greenwich Street
ADDRESSNew York, NY 10013
CITY STATE ZIP7011 3500 0003 2185 2006
CERTIFIED RECEIPT NUMBER

U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com®	
OFFICIAL USE	
Postage	\$.71
Certified Fee	3.60
Return Receipt Fee (Endorsement Required)	2.85
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 7.16
Sent To <u>Citibank N.A. by serving Mike Corbat</u> <u>CEO of Citibank N.A.</u> Street, Apt. No., or PO Box No. <u>388 Greenwich Street</u> City, State, ZIP+4 <u>New York NY 10013</u>	
PS Form 3800, August 2006	
See Reverse for Instructions	

Sworn and Subscribed before me this 6th day of April, 2021.
Maria Perez
 Clerk of the Court / Notary Public

Plaintiff Christopher Eustice

VS

Defendant Citibank, N.A.

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TO THE FOLLOWING:

Citibank, N.A. by Serving
Mike Corbat, CEO of Citibank, N.A.
 NAME

212 W 18th St
 ADDRESS

New York, NY 10011
 CITY STATE ZIP

7011 3500 0003 2185 2013
 CERTIFIED RECEIPT NUMBER

U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$.71
Certified Fee	3.60
Return Receipt Fee (Endorsement Required)	2.85
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 7.16
Postmark Here	
Sent To <u>Citibank, N.A. by Serving Mike Corbat</u> <u>CEO of Citibank, N.A.</u> Street, Apt. No., or PO Box No. <u>212 W 18th St.</u> City, State, ZIP+4 <u>New York, NY 10011</u>	
PS Form 3800, August 2006 See Reverse for Instructions	

Sworn and Subscribed before me this 6th day of April, 2021.

Marilee Perry
 Clerk of the Court / Notary Public

Citibank, N.A. by Serving
Mike Corbat, CEO of Citibank, N.A.
212 W 18th St
New York NY 10011

215100020040

Case Number: 215100020040

Christopher Eustice
Plaintiff
vs.
Citibank, N.A.
Defendant

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In the Justice Court
Harris County, Texas
Precinct 5, Place 1
6000 Chimney Rock Road
Suite 102
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713-274-8700
www.jp.hctx.net

Citation (Small Claims Case)

THE STATE OF TEXAS
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TO: ANY SHERIFF, CONSTABLE, PROCESS SERVER CERTIFIED UNDER ORDER OF THE SUPREME COURT,
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ALTERNATIVE SERVICE ADDRESS
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Date: 4/6/2021



/s/ Mariela Perez
Clerk of the Court
Harris County Justice Court
Precinct 5, Place 1

Address of Plaintiff

655 West Forest Dr
Houston TX 77079

Address of Plaintiff's Attorney

Small Claims Petition

NO. 215100020040

Christopher Eustice
Plaintiff(s)
vs.
Citibank, N.A.
Defendant(s)
Plaintiff: Christopher Eustice

§ In the Justice Court of Harris County, Texas
§ Precinct 5 Place 1
§
§
§

Describe the legal nature of the plaintiff (e.g., individual, sole proprietorship, partnership, corporation)
Individual

Defendant: Citibank, N.A.
Address: 388 Greenwich Street
City: New York State: NY Zip: 10013 Date of Birth (if applicable):

Describe the legal nature of the defendant (e.g., individual, sole proprietorship, partnership, corporation)
Corporation

*Defendant may be served by serving Mike Corbat, CEO of Citibank N.A.
(state the name of the defendant if defendant is an individual, or state the name and title of the person who is authorized to receive service of process for the defendant if defendant is a partnership, limited partnership, corporation, or limited liability company), who may be served at
388 Greenwich Street New York NY 10013
(state the address for service of process).
The defendant's usual place of business or residence, or other place where defendant can probably be found is
212 W 18th St New York, NY 10011

Cause of Action

(State the cause of action in plain and concise language, sufficient to give fair notice of the claim and to provide enough information to enable the defendant to prepare a defense. You may include information showing venue is proper in the Justice of the Peace Precinct in which you are filing. If you are seeking personal property, you must describe the property and state the value of the property.)

Defendant unlawfully and fraudulently closed the Plaintiff's bank account near the end of September 2020 in order to avoid paying a \$1500.00 bank account signup bonus. Plaintiff met all funding requirements prior to account closure, and the funds were in place on the account for over 60 days as required. He maintained the balance until Citibank unlawfully closed his account. Citibank refused to pay the \$1500 over a nonmaterial breach of their contract that had nothing to do with the Plaintiff or with account funding requirements. BREACH OF CONTRACT, FCBA VIOLATIONS, AND ELECTRONIC FUNDS TRANSFER ACT ("EFTA") VIOLATIONS FOR MISHANDLED DEBIT CARD DISPUTES, UNLAWFUL CLOSURE OF PLAINTIFF'S BANK ACCOUNTS IN VIOLATION OF
Relief Requested (Describe the relief you are requesting, itemizing the amount of damages you are seeking.)
\$19,568.00 in total monetary damages THE EQUAL CREDIT OPPORTUNITY ACT ("ECOA") 15 U.S.C. §1691 et seq.

Respectfully submitted,
Chris Eustice
Signature of Plaintiff or Plaintiff's Attorney of Record
Address: 655 West Forest Dr. Houston TX 77079
Telephone: 832-259-1634 Fax Number:
E-Mail Address: chris.eustice@sbcglobal.net

Printed Name: Christopher D Eustice
State Bar No.

☒ Plaintiff consents to the e-mail service of the answer and any other motions or pleadings to this e-mail address.

Case Number: 215100020040

Christopher D Eustice	§	In the Justice Court
Plaintiff	§	Harris County, Texas
vs.	§	Precinct <u>5</u> , Place <u>1</u>
	§	
Citibank, N.A.	§	
Defendant	§	

Statement of Inability to Afford Payment of Court Costs or an Appeal Bond

1. Your Information

My full legal name is: Christopher David Eustice My date of birth is: 09 / 02 / 1993
First Middle Last Month/Day/Year

My address is: (Home) 655 West Forest Dr. Houston, TX 77079
 (Mailing) 655 West Forest Dr. Houston, TX 77079

My phone number: 832-259-1634 My email: chris.eustice@sbcglobal.net

About my **dependents**: "The people who depend on me financially are listed below.

Name	Age	Relationship to Me
1 <u>David Robert Eustice</u>	<u>68</u>	<u>Retired Father</u>
2 <u>2 Dogs and 2 Cats</u>		<u>House Pets</u>
3 _____		
4 _____		
5 _____		
6 _____		

2. Are you represented by Legal Aid?

☐ I am being represented in this case for free by an attorney who works for a legal aid provider or who received my case through a legal aid provider. I have attached the certificate the legal aid provider gave me as 'Exhibit: Legal Aid Certificate.

-or-

☐ I asked a legal-aid provider to represent me, and the provider determined that I am financially eligible for representation, but the provider could not take my case. I have attached documentation from legal aid stating this.

or-

☒ I am not represented by legal aid. I did not apply for representation by legal aid.

3. Do you receive public benefits?

☐ I do not receive needs-based public benefits. - or -

☒ I receive these **public benefits/government entitlements** that are based on indigency:

(Check ALL boxes that apply and attach proof to this form, such as a copy of an eligibility form or check.)

☐ Food stamps/SNAP ☐ TANF ☐ Medicaid ☐ CHIP ☐ SSI ☐ WIC ☐ AABD

☐ Public Housing or Section 8 Housing ☐ Low-Income Energy Assistance ☐ Emergency Assistance

☐ Telephone Lifeline ☐ Community Care via DADS ☐ LIS in Medicare ("Extra Help")

☐ Needs-based VA Pension ☐ Child Care Assistance under Child Care and Development Block Grant

☐ County Assistance, County Health Care, or General Assistance (GA)

☒ Other: _____

4. What is your monthly income and income sources?

"I get this monthly income:

\$ N/A in monthly wages. I work as a President/CEO for OpticsandAmmo, LLC.
Your job title Your employer\$ 0 in monthly unemployment. I have been unemployed since (date) _____.\$ 500 in public benefits per month.\$ 0 from other people in my household each month: (List only if other members contribute to your household income.)\$ 0 from ☐ Retirement/Pension ☐ Tips, bonuses ☐ Disability ☐ Worker's Comp
☐ Social Security ☐ Military Housing ☐ Dividends, interest, royalties
☐ Child/spousal support
☐ My spouse's income or income from another member of my household (If available)\$ N/A from other jobs/sources of income. (Describe) _____\$ N/A is my **total monthly** income.

Net Income was Negative \$25000 in April 2019

5. What is the value of your property?

"My property includes:

	Value*
Cash	\$ <u>N/A</u>
Bank accounts, other financial assets	
<u>\$25,000 in personal</u>	\$ <u>\$25,000</u>
<u>bank accounts</u>	\$ _____
_____	\$ _____
Vehicles (cars, boats) (make and year)	
<u>I do not own the</u>	\$ _____
<u>title to any vehicles</u>	\$ _____
_____	\$ _____
Other property (like jewelry, stocks, land, another house, etc.)	
<u>My parents own everything</u>	\$ <u>N/A</u>
_____	\$ _____
_____	\$ _____

Total value of property \$ Not Sure**6. What are your monthly expenses?**

"My monthly expenses are:

	Amount
Rent/house payments/maintenance	\$ _____
Food and household supplies	\$ _____
Utilities and telephone	\$ _____
Clothing and laundry	\$ _____
Medical and dental expenses	\$ _____
Insurance (life, health, auto, etc.)	\$ _____
School and child care	\$ _____
Transportation, auto repair, gas	\$ _____
Child / spousal support	\$ _____
Wages withheld by court order	\$ _____
Debt payments paid to: (List)	\$ _____
_____	\$ _____
_____	\$ _____

Total/Monthly Expenses \$ 20,000

*The value is the amount the item would sell for less the amount you still owe on it, if anything.

7. Are there debts or other facts explaining your financial situation?

"My debts include: (List debt and amount owed) I have a lot of debt from college and business expenses. I'm a full time college student and I've been a full time college student for the past 7 years. My father is retired and my mother may retire soon. I have medical expenses from a physical injury and other legal expenses."

If you want the court to consider other facts, such as unusual medical expenses, family emergencies, etc., attach another page to this form labeled "Exhibit: Additional Supporting Facts." **Check here if you attach another page.** ☐

8. Declaration

I declare under penalty of perjury that the foregoing is true and correct. I further swear:

☒ I cannot afford to pay court costs.☒ I cannot furnish an appeal bond or pay a cash deposit to appeal a justice court decision.My name is Christopher D Eustice. My date of birth is: 09 / 2 / 1993.My address is 655 West Forest Dr. Houston, TX 77079 USA
Street City State Zip Code Country

► Chris Eustice signed on 1 / 8 / 21 in Harris County, TX
Signature Month/Day/Year county name State



Judge Israel B. García, Jr.

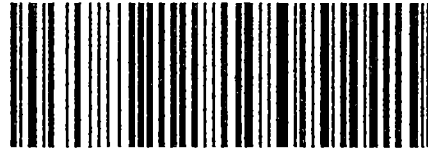
Justice of the Peace, Precinct 5 Place 1

Harris County, Texas

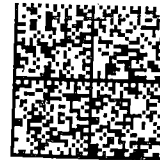
6000 Chimney Rock, Suite 102

Houston, Texas 77081

CERTIFIED MAIL™



7011 3500 0003 2185 2013



U.S. POSTAGE >>> PITNEY BOWES



ZIP 77081

02.4W

\$ 007.16⁰

0000359126 APR 07, 2021

2021 APR 22 AM 10:37

FILED
JUDGE ISRAEL B. GARCIA, JR.
PRECINCT 5 PLACE 1
HARRIS COUNTY, TEXAS

NIXIE

100 DE 1

0004/16/21

RETURN TO SENDER

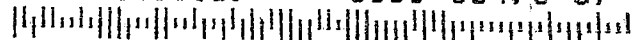
REFUSED

UNABLE TO FORWARD

1001184554 REF
77081>4000

BC: 77081400027

*0933-08476-07-44



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Citibank, N.A. by Sening
Mike Corbat, CEO of Citibank
N.A.
212 W 18th St
New York, NY 10011



9590 9402 4535 8278 9491 27

2. Article Number (Transfer from service label)

7011 3500 0003 2185 2013

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- | | |
|---|--|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input checked="" type="checkbox"/> Adult Signature Restricted Delivery | <input checked="" type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input checked="" type="checkbox"/> Registered Mail Restricted Delivery |
| <input checked="" type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input checked="" type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | |

PS Form 3811, July 2015 PSN 7530-02-000-9053

215100020040

Domestic Return Receipt